

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

NATIONAL CREDIT ADJUSTERS, LLC,

Plaintiff,

COURT FILE NO.: 1:15-cv-861

v.

CRED X DEBT RECOVERY, LLC,
JAMES SAUER, JEFFREY SCHULTZ,
RICHARD SCHULTZ AND JOHN DOES
1-10

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT PURSUANT TO RULE 55(a)
OF THE FEDERAL RULES OF CIVIL PROCEDURE

NOW COMES the Plaintiff, NATIONAL CREDIT ADJUSTERS, LLC, by and through their attorneys, PELTAN LAW, PLLC, and pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, hereby respectfully requests that the Clerk of the Court enter the default of CRED X DEBT RECOVERY, LLC, JAMES SAUER, JEFFREY SCHULTZ, AND RICHARD SCHULTZ, for their failure to answer or otherwise plead. In support thereof, Plaintiff states as follows:

1. Defendant Richard Schultz was served on November 6, 2015. (A true and exact copy of the return of service is attached hereto as **Exhibit A**).
2. Defendant Jeffrey Schultz was served on October 7, 2015. (A true and exact copy of the return of service is attached hereto as **Exhibit B**).

3. Defendant James Sauer was served on October 7, 2015. (A true and exact copy of the return of service is attached hereto as **Exhibit C**).
4. Defendant Cred X Debt Recovery, LLC was served on October 7, 2015. (A true and exact copy of the return of service is attached hereto as **Exhibit D**).
5. The latest answer or other responsive pleading of all Defendants was due on or before November 27, 2015.
6. After a complete review of the court docket, Plaintiff has determined that the Defendant has failed to answer or otherwise plead. (See **Exhibit E**).

WHEREFORE, Plaintiff, NATIONAL CREDIT ADJUSTERS, LLC, respectfully requests that the Clerk enter the default of CRED X DEBT RECOVERY, LLC, JAMES SAUER, JEFFREY SCHULTZ, AND RICHARD SCHULTZ.

Respectfully submitted,

NATIONAL CREDIT ADJUSTERS, LLC

s/ Brandon M. Wrazen
Brandon M. Wrazen, Esq.
Attorney for Plaintiff National Credit Adjusters, LLC
Peltan Law, PLLC
128 Church Street
East Aurora, NY 14052
(716) 523-7764
brandonwrazen@peltanlaw.com

CERTIFICATE OF SERVICE

I, Brandon Wrazen, an attorney, certify that on September 2, 2016, I shall cause to be served a copy of **Plaintiff's Request for Clerk's Entry of Default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure**, upon the above named individual(s) by: depositing same in the U.S. Mail box certified, prior to 5:00 p.m., postage prepaid; messenger deliver; to be served as follows:

Richard Schultz: 4252 Ridge Lea, Suite 106, Amherst, NY 14226

Jeffrey Schultz: 678 Cleveland Drive, Cheektowaga, NY 14225

James Sauer: 4252 Ridge Lea, Suite 106, Amherst, NY 14226

Cred X Recovery Services, LLC: 4252 Ridge Lea, Suite 106, Amherst, NY 14226

and electronically via the Case Management/Electronic Case Filing system (“ECF”).

s/ Brandon M. Wrazen
Brandon M. Wrazen, Esq.
Attorney for Defendant